

MARK G. HENNESS, ESQ.
Nevada Bar No. 5842
mghesq@hennessandhaight.com
JACOB S. SMITH, ESQ.
Nevada Bar No. 10231
jake@hennessandhaight.com
HENNESS & HAIGHT
8972 Spanish Ridge Avenue
Las Vegas, Nevada 89148
(702) 862-8200
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PAMELA GROGAN, individually,

Plaintiffs,

vs.

Case No.: 2:17-cv-01044-APG-VCF

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, an entity licensed
to do business in Nevada; DOES I through X;
and ROE CORPORATIONS, XI through XX,
inclusive,

Defendants.

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**
(Second Request)

COMES NOW, Plaintiff, PAMELA GROGAN, by and through her counsel of record,
MARK G. HENNESS, ESQ. and JACOB S. SMITH, ESQ. of the law firm of HENNESS &
HAIGHT and Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY,
by and through its counsel of record, BENJAMIN J. CARMAN, ESQ. of the law firm of RANALLI
ZANIEL FOWLER & MORAN, and submit the following stipulation and order to extend discovery
deadlines pursuant to LR 26-4 as follows:

1. Summary of Discovery Completed

All parties have provided initial witness lists and documents pursuant to FRCP 26 and
supplements thereto. Plaintiff has executed authorizations served by Defendant. Plaintiff and

1 Defendant had both served written discovery requests on each other, and both parties have
2 responded to the same. Plaintiff is presently working to schedule the depositions of State Farm
3 Adjuster, Kim Korich, as well as the 30(b)(6) witness(es) of State Farm. Plaintiff's deposition is
4 presently set for April 25, 2018.

5
6 **2. Discovery Remaining**

7 The depositions of Plaintiff and Plaintiff's treating doctors must be completed, in addition to
8 the depositions of State Farm Adjuster Kim Korich and other State Farm designees and witnesses,
9 as necessary. Additionally, non-party witnesses and the parties' expert witnesses (once disclosed)
10 need to be taken. To the extent necessary, the parties may also seek to propound additional written
11 discovery and/or follow up on the discovery already propounded.
12

13 **3. Reason Why Discovery Was Not Completed**

14 Discovery in this matter is currently scheduled to close on June 3, 2018. Additional time is
15 required to work through scheduling issues so that discovery may be completed. Specifically, the
16 parties require additional time in order to coordinate the depositions of the Defendant's employees
17 and corporate representatives. For example, Kim Korich, the claims adjuster who handled the
18 subject claim, is no longer an employee of Defendant State Farm. Because she is not able to take
19 leave during business hours at her new employer, Ms. Korich has requested that her deposition be
20 scheduled for after 6pm or on a Saturday. Plaintiff's counsel is agreeable to accommodating this
21 request, but needs additional time to make schedule arrangements for an after-hours deposition.
22 Moreover, as Plaintiff would like to have Ms. Korich's deposition testimony prior to expert
23 disclosures, the present dates needed to be moved back. This is the parties' second request for an
24 extension of discovery deadlines in this matter; therefore, the parties have agreed to an extension of
25 the discovery deadlines by 45 days to enable them to complete the remaining discovery.
26
27
28

///

1 **4. Proposed Schedule for Completing Discovery**

2 Accordingly, the parties respectfully request that this Court enter an order setting the
3 following discovery plan and scheduling order dates:
4

5

Event	Former Deadline	New Deadline
Discovery Deadline	06/13/18	07/27/2018
Motions to Amend Pleadings and Add Parties	03/12/18	04/26/2018
Initial Expert Designations	04/12/18	05/28/2018
Rebuttal Expert Designations	05/14/18	06/28/2018
Dispositive Motions	07/13/18	08/27/2018
Joint Pre-Trial Order	08/13/18	09/27/2018

12

13
14 Counsel further states that the requested extension of the discovery deadline is not intended
15 for purposes of delay, but rather for the purposes set forth hereinabove.
16

17 Dated this 3rd day of April, 2018.

Dated this 3rd day of April, 2018.

18 HENNESS & HAIGHT

RANALLI ZANIEL FOWLER & MORAN,
LLC

19
20 /s/ JACOB S. SMITH, ESQ.

/s/ BENJAMIN J. CARMAN, ESQ.

21 MARK G. HENNESS, ESQ.
Nevada Bar No. 5842
22 JACOB S. SMITH, ESQ.
Nevada Bar No. 10231
23 8972 Spanish Ridge Avenue
24 Las Vegas, Nevada 89148
Attorney for Plaintiff

GEORGE M. RANALLI, ESQ.
Nevada Bar No. 5748
BENJAMIN J. CARMAN, ESQ.
Nevada Bar No. 12565
2400 West Horizon Ridge Parkway
Henderson, Nevada 89052
Attorneys for Defendant

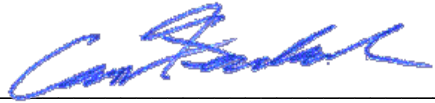
25
26 ///

27 ///

28 ///

ORDER

IT IS SO ORDERED this 4th day of April, 2018.



UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

HENNESS & HAIGHT

/S/ JACOB S. SMITH, ESQ.

MARK G. HENNESS, ESQ.

Nevada Bar No. 5842

JACOB S. SMITH, ESQ.

Nevada Bar No. 10231

8972 Spanish Ridge Avenue

Las Vegas, Nevada 89148

Attorney for Plaintiff